The Honorable Robert S. Lasnik 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT TACOMA 9 SUSAN SOTO PALMER, et al., 10 NO. 3:22-cv-05035-RSL Plaintiffs, DEFENDANT SECRETARY OF STATE 11 STEVEN HOBBS'S MEMORANDUM 12 REGARDING REMEDIAL MAPS v. STEVEN HOBBS, et al., 13 Defendants. 14 15 JOSE TREVINO, et al. Intervenor-Defendants. 16 17 The purpose of this memorandum and accompanying declaration is to provide this Court 18 with technical information related to proposed Remedial Map 3A. Specifically, the attached 19 declaration identifies 18 instances where the proposed map creates "trapped polygons," which 20 are areas caught between county boundaries, congressional district lines, legislative district lines, 21 county council or commissioner district lines, and city or town limits. While the declaration 22 identifies possible remedies to the issues of trapped polygons, these would be very minor 23 adjustments. In ten instances, the changes would affect zero people. Each of the remaining 24

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instances would affect between 2 and 17 people.

This is not intended to be an expert report. Instead, this is the type of information that the 1 2 Secretary provided to the Legislature after the Redistricting Commission submitted its congressional and legislative district maps. This information is solely intended to assist the Court 3 and the expert retained to assist the Court. 4 5 RESPECTFULLY SUBMITTED this 23rd day of February, 2024. 6 ROBERT W. FERGUSON Attorney General 7 s/Karl D. Smith 8 KARL D. SMITH, WSBA 41988 Deputy Solicitor General 9 KATE Š. WORTHINGTON, WSBA 47556 Assistant Attorney General 10 1125 Washington Street SE PO Box 40100 Olympia, WA 98504-0100 11 (360) 753-6200 12 Karl.Smith@atg.wa.gov Kate. Worthington@atg.wa.gov 13 Attorneys for Defendant Steven Hobbs 14 15 16 17 18 19 20 21 22 23 24 25 26

**DECLARATION OF SERVICE** 1 I hereby declare that on this day I caused the foregoing document to be electronically 2 filed with the Clerk of the Court using the Court's CM/ECF System which will serve a copy of 3 this document upon all counsel of record. 4 DATED this 23rd day of February 2024, at Olympia, Washington. 5 6 s/Leena Vanderwood 7 Leena Vanderwood Paralegal 1125 Washington Street SE 8 PO Box 40100 9 Olympia, WA 98504-0100 (360) 753-6200 Leena. Vanderwood@atg.wa.gov 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26